

# Weston Colville Parish Council

## Response to the request for comments on the Scoping Environmental Impact Assessment (EIA) Report for Kingsway Solar

### 1 Executive Summary

- Our response is to the whole EIA Report, but we concentrate on the proposals as they affect development area C.
- We believe Parish Councils should be included as consultees so that benefit can be made of their vast local knowledge.
- The inclusion of area C seems a late, ill-considered and sloppily presented addition to the Report and has raised significant local concern about the primary role of ‘willing landowners’ in the site selection process as opposed to the use of wider and more appropriate criteria.
- We have grave concerns regarding area C’s impact on the villages of Weston Colville and West Wrating. We are especially concerned that the report does not even show Weston Colville or Weston Green as a residential area.
- We identify numerous specific concerns regarding the Kingsway proposal which include:
  - Proximity to dwellings in area C
  - Irreversible loss of visual amenity both on village and public rights of way (PRoWs)
  - Increased flooding risk
  - Biodiversity, habitats and wildlife
  - BESS safety
  - Cultural heritage
  - Traffic and Transport issues and the unsuitability of transport infrastructure for this project
  - Agricultural land classification and the loss of valuable land for food production

Perhaps our greatest concern is the **environmental risk for Weston Colville and its inhabitants of the increased likelihood of flash flooding.**

Finally, we would like to also endorse the comments in West Wrating Parish Councils’ response to this consultation which covers all three areas A, B and C.

### 2 Background: about Weston Colville

#### 2.1 Character and nature of our community

Weston Colville which also includes Weston Green has been a major settlement since the eleventh century and has a population of about 450 people. This includes several who have lived in the village for a considerable proportion of their lives while others have chosen to move to the area to enjoy the countryside. By choosing to live in Weston Colville they sacrifice good transport links and the convenience of having a local shop and pub to enjoy a more peaceful country lifestyle. Many residents own dogs and enjoy regular dog walks along the footpaths so they can enjoy the rural setting. Walkers enjoy seeing the changing seasons as arable crops grow, ripen and harvest, and trees come into leaf offering refuge for wildlife. Villages take an active interest in nature, biodiversity and the environment and many are involved in local conservation projects such as the preservation of Lower Wood nature reserve and the long running Marsh Tit survey.

The village has a strong sense of community as demonstrated by the high attendances at the various social events at the Reading Room (village hall) and the concerts and dramas performed by professional entertainers in our Church which also has regular services and seasonal events such as Easter egg hunts, carol services and a Christmas Fayre. These events bring all age groups together.



Figure 1. Christmas party held in Reading Room

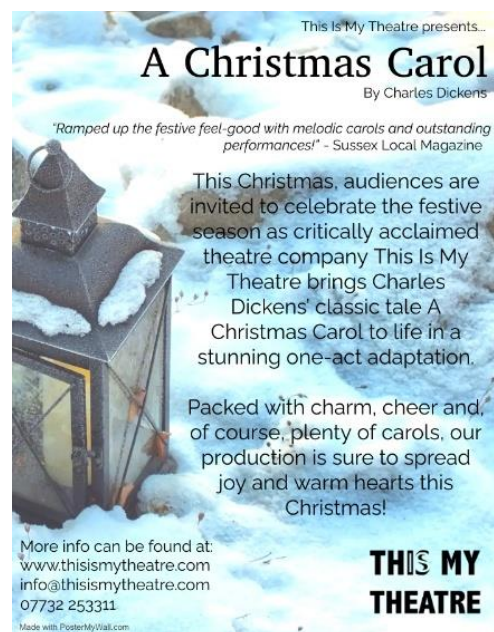
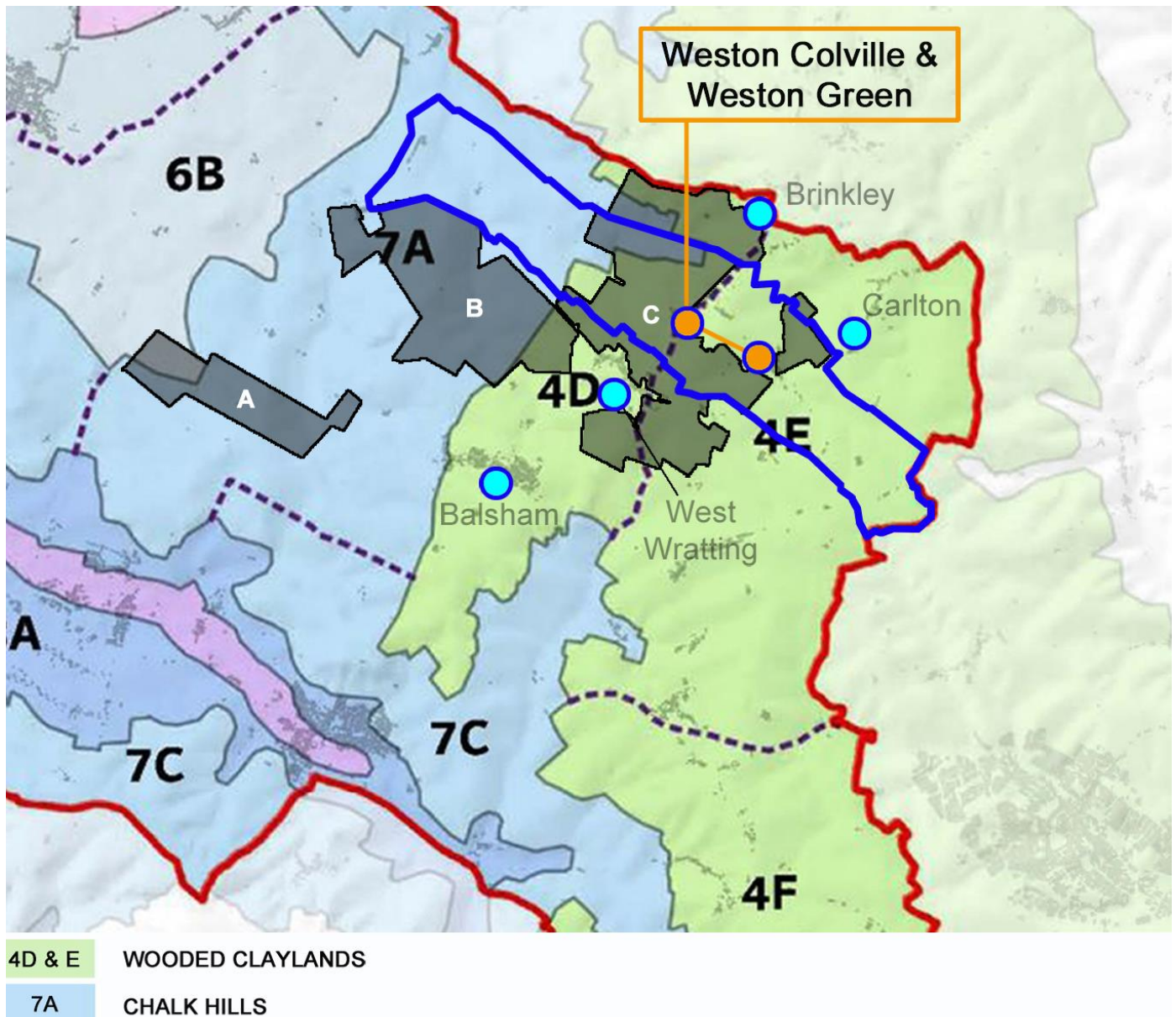


Figure 2. Drama performed in the church 12.12.24

## 2.2 The landscape of Weston Colville and the development area

The solar farm's development area C is a wooded clayland landscape (4D,4E) which is in good condition with strong character. The Greater Cambridge Shared Planning's landscape assessment judged it to need a management strategy to "conserve" so that the local distinctiveness and sense of place are appropriately protected, managed and enhanced.

The parish of Weston Colville contains most of the solar farm area C which includes this wooded clayland landscape.



**Figure 3.** The boundary of the solar farm area C superimposed on the landscape character map from the Greater Cambridge Shared Planning Landscape Character Assessment 2021.

Weston Colville's rolling wooded claylands landscape, characterised as 4D & E, is not only comprised of ancient agricultural land (farmed since the neolithic era), but is also hilly and picturesque. Unlike much of Cambridgeshire, which is notoriously flat, the striking vistas of Weston Colville are typical of the gently undulating countryside of East Cambridgeshire as it approaches the Suffolk border. The area generally has a remote, rural and tranquil character not unlike the areas of outstanding beauty further east in Clare, Sudbury

and the Dedham Vale. Large arable fields are surrounded by extensive hedgerows, many of which are of ancient origin, reflecting the area's longstanding association with cultivation of the richly fertile heavy clay soil. Since Neolithic times, the area has been recognised as the ideal site for mixed cultivation of animals, crops and wooded areas. The route of the historic Icknield Way passes through the village linking this area of uniquely picturesque landscapes with historical and ecological sites in neighbouring LCAs.

The village's many intensively cultivated fields and carefully maintained hedgerows rely on a complex network of long-established watercourses for drainage, and these also border the woods, houses, roads and footpaths, feeding ultimately into the River Stour. Together, these features of fields, woodlands, hedges and waterways combine to create long, 'classic' expansive views of open countryside extending to distant wooded skylines. From the most elevated parts of the village, at both ends, and to either side, views extend for many miles, taking in the nearby woodland forests in Great Bradley, and all the way back to Balsham. Both the frequent and comparatively high elevation of many of the woods, fields, footpaths, roads and village houses make it very difficult to envisage how effective 'screening' of glass and metal panels up to four meters high could be achieved in such a landscape.

### 3 General difficulties and uncertainties

There are a several general difficulties and uncertainties of concern within the current draft of the Kingsway EIA scoping report.

At present, the layout of the proposed Kingsway scheme (e.g., position of solar panels, batteries, etc.) has not been finalised. The scoping report repeatedly says, "*the detailed design of the Scheme is still emerging, as are the environmental surveys and assessments required to support the planning and EIA process*". This indeterminacy, which prevents any more specific comment on the exact nature of the Kingsway proposal, exacerbated by the many inaccuracies and errors in the lengthy EIA document that is the basis for this Scoping Consultation. For example, Section 2.5.3 claims that the applicant intends to use the 'Rochdale Envelope' approach to delay finalising details of design, with some of these details possibly not being decided until after the development consent order (DCO) is made. Other parts of the scoping EIA have clearly been copied from documentation about completely unrelated NSIP proposals, such as the list of directions and distances of habitats in section 4.11.6 (which are clearly copied from the Sunnica documentation).

Indeed, the scoping EIA document has clearly not even been proofread as it retains internal references that relate to earlier drafting stages (e.g., section 5.8.1 says "*refer to Section Error! Reference source not found*"). Similar errors in chapter 2 confirm it was written before area C was added to the scheme. Although some of these errors are corrected in later more detailed chapters, others, such as the lack of recognition that Weston Colville is even a residential area, unfortunately add to the impression firmly established by the poorly handled initial Kingsway public consultation that the team in charge of this huge scheme does not appear to have even basic knowledge of the largest area it is proposing to develop.

### 4 Choice of location (alternatives considered)

Chapter 3 of the scoping EIA report discusses "*the reasonable alternatives studied by the applicant*" that must be included in the environmental statement (ES). It would appear to Weston Colville parish council that the path followed by the applicant to arrive at the area considered in their scheme was much more haphazard than they describe in sections 3.2.2 onwards; especially for area C, which, as noted above, was clearly added to the plan sometime after parts of the scoping EIA report had been written. These worrying omissions and inaccuracies are compounded by others.

For example, Section 3.2.1 states that the site selection was informed by local planning policies for the relevant county and district councils. However, any development of this scale in this landscape clearly contravenes those local policies, such as the vital protection of open countryside, which are clearly being ignored. Similarly, section 3.2.4 states that a key factor in choosing the location was land characteristics and

environmental qualities in spite of the fact that all three land areas have a “rolling rural landscape”—making it impossible to screen large areas of land from the historic linear features in this area (Fleam Dyke, Icknield Way, etc.). The presence of the headwaters of the River Stour in the Village of Weston Colville and the direct proximity of the Kingsway scheme to underlying principal chalk aquifer further call into question the suitability of the site, as does the highly residential nature of Area C in relation to the questionable safety of the BESS that would need to be located near the panels. Further questions surround the long distance to an as-yet unbuilt substation in Burwell.

Table 3-1 states that “*The search area is generally outside flood zones 2 and 3*” This was clearly written before the addition of area C which includes numerous residences, including several listed buildings, in flood zones 2 and 3. Both Weston Colville and Weston Green regularly flood, blocking roads and thus access to the village. The impact on flash flooding, which must be calculated for the next half century, in a context of rapidly accelerating climate change effects, cannot be excluded from the Kingsway proposal’s EIA and ES

Table 3-1 also states that “*Consideration was given to the proximity of nearby sensitive human receptors which include residential dwellings, populated areas and villages*” providing yet another worrying example of how much of the EIA was written with no consideration at for area C – which is by far the largest and most complex area of the proposed Kingsway scheme. Although it can possibly be considered accurate for areas A and B, lack of proximity to residential dwellings cannot possibly be a criteria for choosing area C, which effectively surrounds several villages with a combined population of more than 1500 people—with more houses being built. Table 3-1 also claims that “*The Applicant also considered the location of PRowS in the area and sought to identify a site which would reduce impact on these routes*”. This must have been written before area C (with its numerous PRowS) was added to the scheme and is inconsistent with what is stated elsewhere in the report.

It is the considered view of the Weston Colville Parish Council that area C has been added to the scheme late and in a particularly haphazard way, on the sole grounds that the ‘willing landowner’ only recently volunteered to make his extensive local land-holdings available to the Applicant. In addition to more than doubling the size of the proposal, this addition also took it out of local planning and into the controversial DESNZ NSIP fast-approval track. There is currently no Land Use Framework in the UK but the most respected work to identify where solar panels should be located shows suitable land in the vicinity of areas A and B but not C.

In summary, the environmental statement needs to present a much stronger detailed justification for the inclusion of area C in the scheme than is suggested by chapter 3 of the scoping EIA report.

## 5 Major accidents and disasters—BESS safety

Section 5.6 of the EIA scoping report proposes to exclude major accidents and disasters from the scope of the EIA even though it recognises (in table 5-2) that there is a fire risk associated with the Battery Energy Storage System (BESS). The worryingly over-confident justification offered for this exclusion are that “*the mitigation in place is generally sufficient to manage vulnerabilities to major accidents and/or disasters without the need for additional mitigation in most circumstances*” (5.6.6) and that “*no significant effects in relation to major accidents and disasters are anticipated*” (5.6.6). This would appear to imply that the applicant does not sufficiently understand the serious impacts of a BESS fire, nor the considerable ongoing uncertainties involved in assessing how best to handle them if they do occur.

Although BESS fires are rare, their impact is severe and potentially life threatening, and as these battery sites become ever larger, such fire risks are exponentially higher. The overall risks to both immediate and less proximate ‘sensitive receptors’ -- including not only people, plants and animals, but entire ecosystems, waterways and landscapes – are of major concern as has been clearly detailed in advice from the National Fire Chiefs Council Fire Rescue service, as well as in numerous articles in the scientific literature. It is concerning to read in section 2.10.8 of the scoping EIA that “*all safety concerns around the BESS element are addressed in so far as is reasonably practicable*”. From what has been learnt from BESS fires at fairly small-scale facilities

(~1 MW) experts (The Arizona Regulator 2019) have warned that a fire at a very large facility (>100 MW) would have very severe and potentially catastrophic consequences.

BESS fires release a plume of hydrogen fluoride vapour (the most highly corrosive acid) that can be dispersed over distances of kilometres, and the cooling water that must be used to prevent escalation of the fire to other battery units becomes contaminated with the acid. The large amounts of cooling water needed to combat potential BESS fires must be stored on-site, and the water from these reservoirs, if deployed, must be recovered to prevent it from affecting the soil or other nearby water bodies.

There needs to be a much more rigorous and credible examination of the risks of battery fires, as well as properly researched justification for positioning tennis court-sized lithium-ion battery banks anywhere near residential communities – several of which there are dispersed throughout area C. Detailed information about the layout and mitigation measures needs to be scoped, documented and meaningfully assessed. For a scheme intended to last half a century, the consideration of major accidents in general – including those associated with decommissioning – must be comprehensive and detailed. These details need to be central to the EIA, not relegated to an outline Battery Safety Management Plan as proposed in section 2.7.19.

In conclusion, it is essential that the risk of a major accident or disaster caused by fire in the BESS is scoped in for further assessment as part of the EIA and therefore considered in the ES.

## 6 Water

The topic of water is addressed in several places in the scoping EIA document and is yet another subject that appears to have been compromised by the late addition of area C to the scheme, the hurried preparation of the EIA, and the unacceptable lack of due diligence that is the result of these gravely worrying deficiencies.

In section 4.11.2 for example only two waterbodies are named for inclusion in a Water Framework Directive (WFD) assessment, Swaffham-Bulbeck Lode and Bottisham Lode-Quy Water. These are relevant for areas A and B but are not the major waterbodies critically relevant to the Environmental Impact on area C, which include the River Stour. The latter must also have a WFD assessment carried out for it. The River Stour is already considered a major flood risk as shown on the Environmental Agency's Flood risk depth map produced on 22nd February 2022. As the EA notes in its most recent (12/24) report, flash flooding from surface water is an increasing risk – and the flood risks of large solar farms are known to be much higher in relation to exceptional, 'one off', events that cause flash flooding see ref:

[https://vufind.lboro.ac.uk/PrimoRecord/cdi\\_proquest\\_journals\\_2906761596](https://vufind.lboro.ac.uk/PrimoRecord/cdi_proquest_journals_2906761596). This type of flooding has been the subject of revised EA guidelines, indicating both that it is likely as many as 1 in 4 homes in the UK will be flooded by 2050, and that the most likely causes of increased flooding will be caused by surface water flooding. This combination of a rare, 'fluke', extreme rainfall event and flash flooding by surface water is exactly what caused the major flood of 2016 which essentially transformed large areas of the village of Weston Colville – half of which lies in a valley—into a lake. Flooding is already considered such a major risk for the village that the Parish Council have a resolute team who oversee regularly updates of our flood plan, the most recent copy of which is attached in Appendix 1. Pictures showing flooding are included in Appendix 5.

5.2 proposes to exclude water from the scope of the EIA. Based on the information above this is wholly inappropriate. **The River Stour should be surveyed and not scoped-out.**

## 7 Flooding

The biggest environmental risk for Weston Colville is flash flooding due to increased rainfall, likely from climate change. There were 6 incidents in 2024 where flooding led to road closure leaving residents unable to leave their properties or use their cars. During major flood events which in 2024 lasted for up to 72 hours roads, fields and gardens were submerged in up to a meter of flood water.

A primary risk of the proposed scheme is that the installation of a solar farm with numerous arrays on the fields between West Wrating and Weston Colville, and in the northwestern parcel, will lead to increased rainwater run-off from the fields exacerbating the flash flood problem with clear potential for repeats of the flood of 28<sup>th</sup> June 2016 when an extended period of torrential rain led to the worst flood the village had had for 30 years with twelve houses being flooded in both Weston Green and Church End, Weston Colville.

**This should be included in both the EIA and the Environmental Statement ES.**

## 8 Agricultural land classification (ARC)

The ARC for Area C needs to be completed rigorously, and as soon as possible in 2025. This evaluation, moreover, needs to be independently verified to ensure how suitable the land really is for solar panels or whether it is generally of a sufficient grade to warrant its retained use for farming. The Parish Council expects the latter to be the case and is concerned by the loss of this land to food production, as well as the risk that evaluations of its grading may be compromised by conflict of interest.

## 9 Landscape and visual amenity

Section 6.2 of the scoping EIA considers the effect of the scheme on landscape and visual amenity. The Parish Council believes that the scale, geographical extent and duration of the proposed development will cause widespread substantial and significant adverse landscape impacts, and prolonged adverse visual impacts. These will be felt most keenly by the residents of Weston Colville, West Wrating and the other villages that are in such close proximity to the scheme in Area C. ‘Protected Open Countryside’ is defined as such primarily because it is a *visual amenity*. Loss of ‘open-ness’ is by definition not a quality that can be ‘mitigated’. Public access to protected open countryside is a cornerstone of land use policy in the UK, as is access to all of the amenities related to the rural environment, green spaces, footpaths and woodlands. All of these vital public amenities have increased in importance in the wake of the COVID 19 epidemics as a) more people have moved to rural areas, b) are working from home and c) appreciate the health and well-being benefits of being outdoors in rural locations

### 9.1 The effect on residents

Residents are not just affected by the impact on their public views and public visual amenity (i.e. the adverse effects on views and visual amenity at their place of residence, which is less important to planning as mentioned in 6.2.11). They also frequently walk in the landscape on the many PROWs and their lives are intimately related to the landscape in which they live—much more than for urban dwellers. Consequently, the imposition of large-scale industrialisation and enclosure of the rural landscape will not only compromise their enjoyment of living in the countryside but cause significant emotional distress.

This sense of grievous loss of treasured local landscape and formerly protected open countryside may not be as strongly felt by people who do not live in a rural community. A good example is in the scoping EIA which implies in section 6.2.5 (baseline conditions on visual receptor: settlements) that the changes introduced by an airport-sized solar industrial complex on their doorstep will not impact the residents because the “*inward looking nature of many of the settlements*” will limit views of the scheme. **This is clearly not true as the substantial number of houses in Weston Green and Weston Colville have windows in living rooms that look out over the fields where the solar panels will be potentially located severely impacting the view of what is currently idyllic countryside.** Section 6.2.5 further claims that “*there is theoretical potential to see elements of the scheme from the edges of these settlements*”—clearly indicating this passage was written by somebody who does not understand rural life. People do not just live in their houses or see the landscape from the edge of our settlements. They live here because they want to be actively part of the countryside. Most villagers enjoy regularly walking the many pathways around our villages and throughout the entire parish enjoying the chance to relax in the beautiful landscape in which we live. As a result, the villagers are the main “*recreational users of PROW [that] would likely be the most sensitive visual receptors of any change in the*

*landscape associated with the Scheme*", as recognised in section 6.2.5 (baseline conditions on visual receptor: recreational routes). The Weston Colville Community Led Plan page 11 attached in Appendix 2 shows that in response to a village questionnaire used to prepare the plan in 2015 79.6% of people surveyed thought that maintaining the rural nature of the village including its access to countryside, peace and quiet and wildlife was "very" important to them whilst a further 13.6% described it as 'quite' important -- totalling 93.2% overall who emphasised this amenity – which ranked highest overall in importance to the villagers surveyed.

## 9.2 The effect on Weston Colville and PRowS

The description of 'Landscape context' in section 6.2.5 of the scoping EIA does not mention any of the villages near areas A, B or C; instead, it mentions villages and houses that are 12 km away and North of the A14, close to the recently approved Sunnica solar farm. This section, again, appears not to have been written for this NSIP.

In section 6.2.5 on 'Visual receptors' the settlement of Weston Colville and West Wrattling are said to be as "*directly adjacent to Developable Area C*". This is a very inaccurate description as these villages are essentially surrounded by the development, as can be seen in Figure 4. The text in this section also incorrectly states that only the outer edges of West Wrattling are within the ZTV, which is the zone where the solar panels and substation are theoretically visible, but figures H1 and H2 clearly show that West Wrattling is entirely inside the ZTV, as are Weston Colville, Weston Green, Willingham Green and most of Carlton. In and around these villages there will consequently be more than just "*distant and filtered glimpses*" of the solar farm infrastructure. The huge scale of the development in area C means that the landscape immediately around all of the affected villages will be changed from rural beauty to an industrial power station, and we will lose the countryside environment in which we have chosen to live.

The description in section 6.2.5 of the effect of the change in landscape and visual amenity on public rights of way (PRow) underestimates the number of these routes that will be affected, particularly in area C, simply stating there are "several PRow within the study area". Elsewhere the report correctly states "*there are numerous PRowS which are within, intersect or are located within 500 m of the site*", and paragraph 2.4.31 acknowledges that of the 174 PRow inside the scheme, the largest number are in area C.

## 9.3 Scoping questions asked in section 6.2.13.

*Do you agree with the proposed consultees to be engaged with on this topic?*

The List should include Parish Councils in section 6.2.1. As they are the most relevant layer of local government to many of the key receptors being assessed within the Landscape and Visual Impact Assessment (LVIA) their advice must be included, particularly on the selection of appropriate viewpoints.

*Do you agree that the surveys proposed to inform the LVIA are appropriate?*

Section 6.2.4 says that surveys of the proposed developable areas were carried out during winter, spring and summer months. This cannot be true for area C as other evidence from the report indicates that area C was added to the project later than spring 2024.

*Are any receptors/assets/resources not identified that you would like to see included in the LVIA?*

No but, it is vital that it is understood how much more profoundly residents of rural villages will be affected by changes to their surrounding landscape and visual amenity than urban dwellers, as described above.

*Do you agree with the proposed additional (secondary and tertiary) mitigation measures and is this mitigation appropriate?*

We are very sceptical about the statement made in section 6.2.6 that "*the landscape design will seek to deliver landscape enhancements over and above the requirement to simply mitigate adverse effects.*" This requires further explanation about the details of this or examples, otherwise this seems extremely unlikely to be the case. Equally we find it hard to believe that "*the scheme will be designed sensitively with consideration to complementing the local character*" (6.2.6). In addition, section 6.2.10 states that a mitigation strategy will be developed that will deliver significant "*green infrastructure connectivity*". However, in the public meeting held



with the Kingsway representative in Weston Colville it was emphatically stated that the residents of Weston Colville would not under any circumstances benefit directly from the green energy generated by the solar farm.

*Do you agree with the landscape and visual receptors that are proposed to be scoped in and out of further assessment?*

Generally, yes, but the Parish Council requests that the impact of lighting on landscape character and visual amenity remain in scope.

*Are there any specific viewpoints that you would like us to consider and/or illustrate as a photomontage?*

Parishioners have prepared a photomontage of and from heritage assets inside and on the edges of the entire scheme area which is included in Appendix 3. It is also important to use views that will show the significance and extent of changes to the settings of Grade II\* listed buildings that are inside or on the boundary of area C. This includes land inside the scheme that is immediately adjacent to the churches at Weston Colville and West Wrattling — this must also include the land around Weston Colville Hall and the farm buildings adjacent to it which will potentially be surrounded by Solar panels, as well as Pound Farm Barns, which are another set of listed buildings whose setting would be utterly transformed by the introduction of an adjacent industrial energy plant of such vast and visually prominent dimensions.

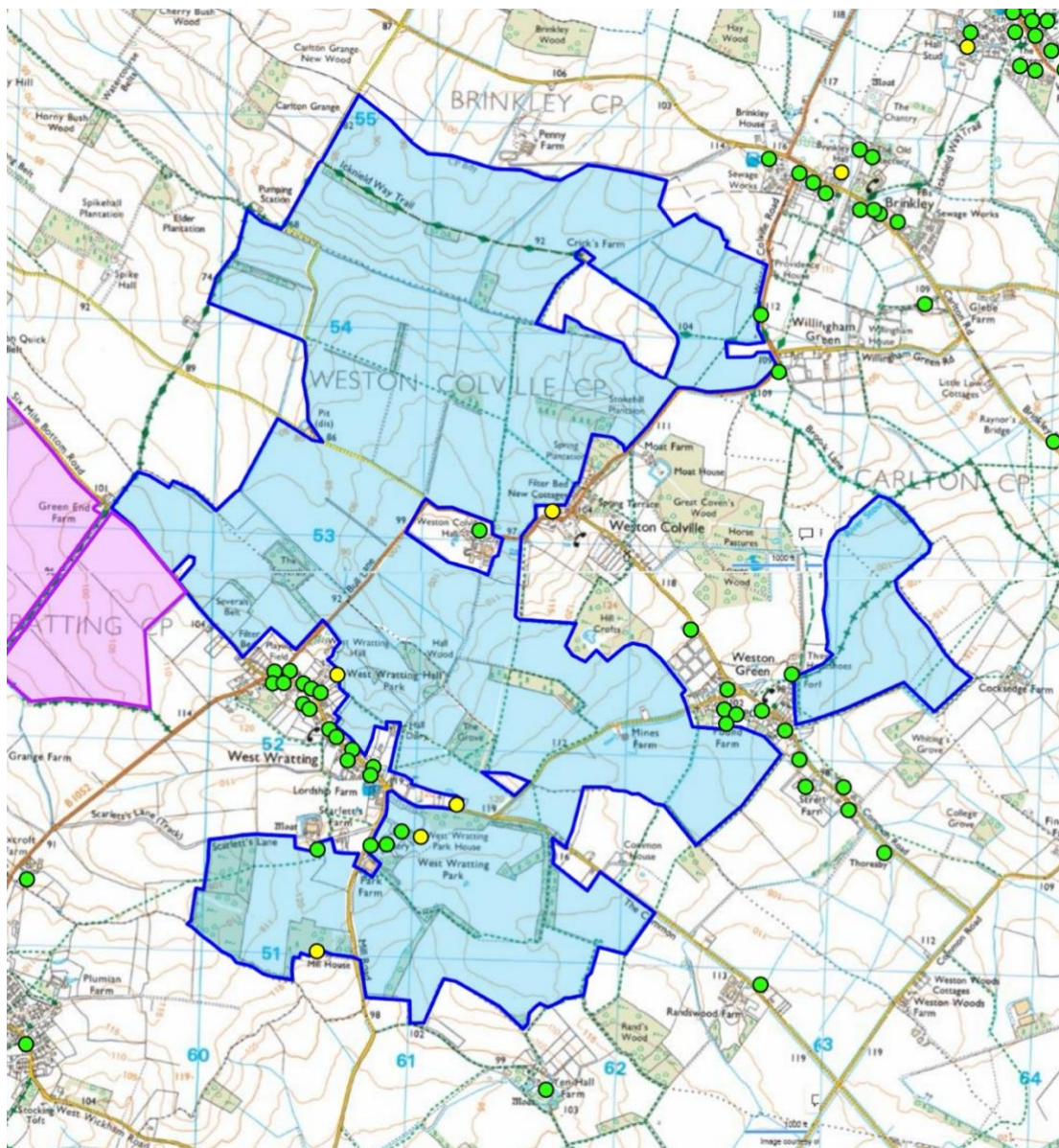
*Are there any other developments which you consider it will be necessary for us to address in a cumulative landscape and visual impact assessment?*

The most northerly parcel of land in Area C, which rises toward Carlton, is directly visible from large parts of Weston Green, and especially from 'The Avenue' on the Byway— the bridleway planted with trees by village residents and a heavily used pathway at the centre of the complex network of footpaths. These amenities, as well as Lower Wood, Whiting's Grove, the Icknield way and the Mines Farm fields are all areas of the village of particular importance in terms of visual amenity.

# Cultural Heritage

Paragraph 2.4.24 of the scoping EIA report states “there are no listed buildings within the developable areas”. In fact, although there are no listed buildings in areas A and B, there are two important listed buildings in Weston Colville that are well inside area C of which the Church is 2\* listed and dates largely from the 14<sup>th</sup> century:

1. II [Weston Colville Hall](#)
2. II\* [The Church of St Mary](#)



**Figure 4.** Listed buildings in and around area C (blue). Grade II buildings are shown in green and grade II\* in yellow. It is comparable with figure I10 in the scoping EIA report.

There are four other listed buildings right on the boundary of development area C, including:

3. II [Pound Farmhouse, Weston Green](#)
4. II [Barn Pound Farm, Weston Green](#)
5. II [Barn Pound Farm, Weston Green](#)
6. II [Three Horseshoe Farmhouse, Weston Green](#)

There are also four listed properties which will have a clear view of the panels:

7. [II Lane House, Weston Colville](#)
8. [II Lane Cottage, Weston Colville](#)
9. [II Coven Wood Cottage, Weston Colville](#)
10. [II Pathways, Weston Green](#)

In addition, there are seven other listed buildings within a few hundred metres of development area C in Weston Colville and Weston Green.

The significance of the scheme (using the methodology of Appendix C in the scoping document) could be very large for some assets of high importance that are in or close to area C if their setting in the landscape is compromised by nearby and visible development see Appendix 3, the photomontage which clearly shows the views from these listed buildings. This is particularly true of the land around Weston Colville Hall and the church.

Similarly, the settings of Pound Farm and Three Horseshoes Farmhouse—which are both right on the boundary of area C—must not be visually compromised by nearby solar farm infrastructure. The text of section 6.3 does not clearly explain the potential level of change to the setting of these assets. Section 6.8.5 says St Marys church is located approximately 20 m from Area C but figure 4 shows their churchyard is immediately adjacent to the scheme boundary.

## 9.4 Scoping questions asked in section 6.3.14.

*Do you agree with the proposed consultees to be engaged with on this topic?*

In addition to the groups and organisations outlined, other interested parties that should be consulted include Cambridge Past and Present (CPPF). CPPF focuses on protecting and enhancing Cambridge's historic and natural assets.

*Do you agree with the proposed study area?*

Generally yes

*Do you agree that the data sources listed to inform the EIA baseline characterisation are appropriate?*

These should include consultations with local historians and community groups.

*Do you agree that the surveys proposed to inform the EIA baseline characterisation are appropriate?*

Generally, yes but we are especially concerned to ensure potential conflicts of interest arising from the Applicant's role in commissioning these surveys is carefully monitored

*Are any receptors/assets/resources not identified that you would like to see included in the EIA?*

The potential ruins of an old manor house in the farmland of Mines Farm which has been mentioned in all its previous planning applications and its rich archaeological heritage (see Appendix 4 Archaeological Assessment of Mines Farm 2013) mean that an archaeological assessment is required in area C, and this should be added to the lists of assets to be assessed. Key areas of biodiversity recovery include Whiting's Grove, as well as Lower Wood.

There is also strong evidence of a Roman villa in the field due north of Weston Colville Hall as shown in the photo In Appendix 3. This would also require archaeological assessment and investigation.

*Do you agree with the proposed additional (secondary and tertiary) mitigation measures and is this mitigation appropriate?*

The proposed secondary mitigation to setting (section 6.3.7) is required more precise definition rather than as it currently states "most likely involve planting and landscaping". This requires better clarification of what is needed and appropriate for the various different cases. Tertiary mitigation factors appear to have been excluded.

*Do you agree with the receptors/matters that are proposed to be scoped in and out of further assessment?*

Two of listed buildings, Weston Colville Hall and St Marys Church which are potentially completely surrounded by the proposed industrial scheme must be scoped-in as parts of the “within the 2 km study area” group, as must be all the listed buildings which are grade II listed on or near the boundary of area C. These will all have comparable sensitivity to the listed buildings that are fully within the site boundary so must be treated similarly. The EIA must ensure that the statement “*Construction activity [that] has the potential to directly impact on these assets ...*” in column 3 of table 6.3.9 includes all activity that could physically damage the receptors, including indirect causes such as subsidence due to altered drainage, and activities related to decommissioning.

## 10 Traffic and Transport

Section 6.7 of the scoping EIA report addresses traffic and transport issues. These will definitely be considerable for the Weston Colville Parish due not only to the very narrow roads but the tight fit between the road banks, watercourses and access points. Many roads flood, have major overhanging trees and sharp turns, and suffer from severe potholes, and/or are single track (in particular the Six Mile Bottom Road towards Weston Colville).

The traffic plan outlined in chapter 2 states that “*construction access will be via the four junctions along the A11, and then onto the local road network: Six Mile Bottom Road, London Road, Balsham Road and an unnamed farm access via Worsted Lodge*” (2.7.33). These routes are shown on a hard to distinguish map, figure 2.2. on page 37. The Weston Colville Parish Council would tend to agree that the impact on roads in areas A and B may be less severe due the existing availability of good farm tracks. However, this is not true for area C, from which to access to the A11 will involve considerable use of the local roads – including by heavy transport and maintenance vehicles. Several of the existing roads are not suitable for HGV traffic, and certainly not at the suggested average volume of 80-100 HGV movements per day, excluding construction staff transportation and ancillary construction traffic (section 2.9.5). The roads between A11 and area C have little to no ability to absorb this increase in level of heavy traffic without fundamentally improving their present condition. Six Mile Bottom Road is particularly concerning.

In table 6.7.5 Six Mile Bottom Road is shown as having sufficient space for “*two streams of traffic passing each other*”. This is clearly not true as it is not wide enough for even two passenger cars in multiple locations. Two HGVs would struggle to pass each other along that road at all, and even two-way continuous car traffic is often not possible because the effective road width is narrowed by deep potholes on both sides of the road. It is common especially in winter months for there to be daily occurrences of cars needing to be recovered by the RAC, AA, etc. because their wheels were damaged by potholes after being forced to drive too close to the edge of the road when passing other vehicles. Any increase in HGV traffic will further degrade the quality of that road, possibly making it unusable for cars. It will require major resurfacing along the entire 3-mile length of this road from West Wrattling to Six Mile Bottom before it could be used for construction vehicles. The addition of more passing places will simply not be sufficient, and it is not at all clear the road could be widened due to the presence of multiple drainage ditches and flood areas.

Near the village of Weston Colville, Chapel Road and Mill Hill are definitely not suitable for 2-way HGV use despite the comments in 6.7.5 *Baseline conditions* based on local knowledge and actual experience see Appendix 6 Road Access through Weston Colville/ Weston Green. As above in the cases of the Six Mile Bottom Road, Chapel Road has a large number of potholes on both edges which often reduce it to a single-track road even for cars. Extensive repair and resurfacing would be required before it could even be used as a single-track road for HGVs. Mill Hill is similarly affected and requires equal amounts of road improvement works before being used by HGVs.

In response to section 6.7.13 *Scoping questions* The Parish Council has the following comments:

- The Parish Councils need to be included in the list of consultees to get the benefit of their local knowledge and experience of the Parish roads and their current use.

- We agree with the proposed study area.
- The data source used to inform the baseline seem to conflict with actual knowledge of the local roads and their lack of width for 2-way traffic.
- Surveys of all local roads in area C should be included in the surveys to inform the EIA baseline characterisation.
- The Green (road linking Mill Hill to Common road) and Horseshoe Lane in Weston Colville should be included as receptors/ assets resources in the EIA.
- There seems little mention of secondary/ tertiary mitigation measures as regards to roads.
- We are happy with the proposed traffic specific assessment approach as long as it includes all local roads in Area C and that it also includes the effect of ‘rush hour’ and school traffic that severely clogs the roads at the relevant times.

## 11 Climate Change Risk

The Climate section 6.9 seems to understate the effect of increased rainfall on the flood risk for Weston Green and Weston Colville and definitely needs to be included in the EIA and ES.

This needs to be included in section 6.8.13 as a *receptor / asset / resource*.

It will also need far more mitigation than that covered by the current *secondary and tertiary mitigation measures proposed*.

It then follows from this that the current *proposed factor specific assessment approach* is insufficient as it excludes the potential flood risk.

## 12 Biodiversity, habitats and wildlife

Section 6.1 of the scoping EIA report is concerned with the impact of the scheme on biodiversity and wildlife. The survey for area C still needs to be completed and as a result is dealt with separately in the tables of matters to be scoped in and out for further assessment. The parish council has concerns regarding some of the matters that are scoped out for area C.

The incomplete level of surveying is highlighted in section 6.1.13 as a "*difficulty and uncertainty*", and 6.1.3 states that Area C "*will be subject to survey in 2025*". This subject area is both important and very reliant on field surveys and the parish council believe that the scoping EIA should not have been put forward for consideration until after the surveys were complete.

Section 6.1.9 states:

*“Whilst the Inter Array Connection Corridors and Developable Area C - East have not been subject to ecological baseline surveys, their close proximity to Developable Areas A - West and B - Central means that they are known to contain similar habitats and be subject to similar constraints to Developable Areas A and B”.*

As mentioned elsewhere in the scoping EIA report and shown clearly in figure 4 area C has a distinctly different landscape character to areas A and B (being wooded clayland rather than chalk hills), which would imply that the ecology and habitats are likely to be different. This is clearly apparent to the residents who live here. More importantly, the relevant waterbodies for area C are very different from those of areas A and B.

Owing to these differences the parish council do not see section 6.1.9 as adequate justification for scoping out a number of receptors/matters from further assessment in area C, which includes: woodlands, rivers, streams,

ponds, hedgerows, reptiles ,ground and non-ground nesting bird (Lark ,Marsh Tits ,Yellow Hammers , Red kites, Barn owl and other raptors ) bats, hares, badgers and newts, frogs , toads and water vole (table 6.1.9 from pages 157-165). Surveys of all these matters must be carried out for area C as they have been for A and B.

There is a clear error in the argument presented in section 6.1.9 (above) to the justification that is given for scoping-out badgers from area C, which states that "*the design will seek to avoid all known setts*" (6.1.9 on page 164). The aerial survey mentioned on page 118 is unlikely to have located all badger setts in area C as they are clearly present to anyone who walks the land so the execution of a proper land-based survey as was done in areas A and B is essential to identify their locations in area C.

The parish council requests that the difficulties and uncertainties section (6.1.13) should acknowledge that most if not all research data about the effect of solar farms on biodiversity, habitat and wildlife has been generated from much smaller scale solar arrays, and there must be uncertainty associated with extrapolating the findings to a scheme of this size.

In summary, we must respond "no" to the scoping question in section 6.1.14—*Do you agree with the receptors/matters that are proposed to be scoped in and out of the EIA?* The following matters must be scoped in for further assessment by the EIA and ES by carrying out surveys in area C as they have been for areas A and B.

## 13 Population and Health

Section 5.8.4 proposes that because human health impacts will be captured by other assessments "*human health is not subject to a stand-alone assessment and therefore a separate ES chapter is excluded from the scope of the EIA*". Although the parish council agrees that a stand-alone assessment is not required it would be better for the relevant material from other assessments to be collected into a separate ES chapter, particularly for the topics bulleted in section 5.8.1.

In the section 'The effect on residents' section of 'Landscape and visual amenity' it should be made clear that there will be a detrimental impact to the mental health and wellbeing of residents of rural villages in close proximity to the scheme—especially those next to area C. This impact on the population seems not to be addressed anywhere in the scoping EIA document. The parish council think it should be part of health considerations in the EIA.

A specific area of concern is the proposed construction schedule of 07:00 to 19:00 Monday to Friday, and 07:00 to 13:00 on Saturday, with construction staff travelling to the site pre-07:00 and departing after 19:00 (for weekdays). The parish council see this to be unacceptable. To prevent detrimental harm to residential amenity for the majority of residents we recommended that construction hours should be limited to between 08:00 and 18:00 Monday-Friday, 08:00 and 13:00 on Saturday, and at no time on Sundays, Public Holidays or Bank Holidays. This is in addition to our far greater concern of the continuous impact of the built site for its entire lifetime.

Section 6.8.9 proposes that private properties and housing to be scoped out of further assessment with the justification that "*No significant effects are expected in relation to private property and housing*". The parish council very strongly contests this claim, based on an analysis of the effect of another solar farm on house prices and on the experience of people who are currently trying to move, sales seem to appear to have stalled because of buyers concerns about the proposed solar farm development. This definite socio-economic effect should be in scope for the EIA with an explanation by the applicant of how they propose to mitigate this impact of their scheme.

# Appendix 1 Weston Colville Parish Council Flood Plan January 2025

<https://westoncolville.org.uk/wp-content/uploads/2025/01/Weston-Colville-CLPPv3.pdf>

## Appendix 2: Weston Colville Community Led Parish Plan

<https://westoncolville.org.uk/wp-content/uploads/2025/01/Floodplanappendix3.docx>



# Appendix 3: Images of listed Buildings in Weston Colville / Weston Green and their settings



Pound Farm, Chapel Road, Weston Green



Pound Farm Barns, Chapel Road, Weston Green



Views from Pound Farm & Barns across affected fields around Mine's Farm //rewriting roadways loads S



Views from Pound Farm & Barns across affected fields around Mine's Farm //shade.exposing customers S



Views from Pound Farm & Barns across affected fields (winter) around Mine's Farm from footpath //daffodils.scar.november SE

Views from Pound Farm & Barns across affected fields (summer) around Mine's Farm from footpath //daffodils.scar.november SW





St Mary's Church, Church End, Weston Colville



St Mary's Church with affected fields behind  
//horseshoe.lifters.padlock NW



Weston Colville Hall

View from St Mary's Church across affected fields to  
Weston Colville Hall //hazel boldest general SW



St Mary's Church

View from footpath across affected fields to  
St Mary's Church //hammer.remission.sized ESE



St Mary's Church

View from footpath across affected fields to  
St Mary's Church //kickers.swoop.tube NNW

Weston Colville Hall, Church End, Weston Colville



View from Weston Colville Hall across affected fields and Roman Villa site  
//drops.feasted.weep N



Roman Villa Site

View from Weston Colville Hall across affected fields to village  
//drops.feasted.weep E



Weston Colville Hall



View from St Mary's Church across affected fields to Weston Colville Hall  
//impeached.nerves.ticking SW

St Mary's Church



View from Weston Colville Hall across affected fields to church  
//sailor.wreck.toned N to E

Weston Colville Hall

Roman Villa Site



View of Weston Colville Hall and Roman Villa site  
//really.hems.showcases W to N

## Appendix 4: Archaeological Assessment of Mines Farm 2013

<https://westoncolville.org.uk/wp-content/uploads/2025/01/Archaeology-Assessment-of-Mines-Farm-Weston-Colville-2013.pdf>

# Appendix 5: Flash Flooding on roads in Weston Colville/ Weston Green, Summer 2016 and Summer 2024



Flash flooding on Horseshoe Lane, summer 2016



Flash flooding on Common Rd, summer 2024



Flash flooding on Chapel Lane, summer 2016



Flash flooding on Common Rd, summer 2024

Flash Flooding on roads in Weston Colville/Weston Green, Summer 2016 & Summer 2024

## Appendix 6: Road Access to Weston Colville/ Weston Green



Road access through Weston Colville/Weston Green, to affected fields